

Remarks

Claims 25 and 26 have been canceled.

The reference to Hightower, newly cited in the Final Rejection dated May 11, 2005, is the only reference showing a brush having a center brush with a pair of side brushes pivotally connected to laterally outermost ends of the center brush. However, as the Examiner notes in his rejection of claim 2, the brush bristles on the outer ends of the center brush are "intertwined" (in the words of the Examiner) with the brush bristles on the innermost ends of the side brushes in order to groom an unbroken swath, given the end-to-end alignment of the brushes. Such intertwining inhibits the ability of the side brushes to pivot freely relative to the center brush - the bristles of the center brush will grip and hold the intertwined bristles on the side brushes.

In this invention, the side and center brushes are longitudinally offset so there is no possible interference between the bristles - the pivoting of the side brushes is not inhibited in any way by bristles on the center brush. In addition, the ends of the side brushes are overlapped with the ends of the center brush to groom an unbroken swath. Claim 1 has been further amended herein to recite both these characteristics of the Applicants' novel brush. This combination is not anticipated or made obvious to one of ordinary skill in the art by Hightower or any of the other prior art of record.


The Examiner's rejections of the remaining independent claims 9 and 27 are respectfully traversed. The Examiner's assertion that the brush of Hightower could obviously be used behind a zero radius turn vehicle is flawed. A zero radius turn vehicle executing a skid turn on a clay tennis court, which is where Hightower's brush is used, would tear up the

tennis court. The last thing that would be obvious to one skilled in the art would be to couple Hightower's brush to a zero radius turn vehicle to groom a clay tennis court surface.

Moreover, assuming for the sake of argument that Hightower's brush could be used behind a zero radius turn vehicle to groom some type of particulate surface, there is no suggestion in any prior art reference that the zero radius turn vehicle be operated to turn sufficiently sharply to eliminate the ungroomed teardrop as set forth in claims 9 and 27. In fact, the Applicants are unaware of any zero radius turn vehicle ever being used as a grooming vehicle for smoothing loose, granular material. Moreover, there is no indication in Hightower that the side brushes 11 will overcome the interference from the brush bristles on the center brush 12 and raise or lift up during the tight turn needed to eliminate the teardrop. Accordingly, claims 9 and 27 are further allowable.

The claims remaining in this application are allowable. It is respectfully requested that this application be allowed and sent to issue.

Respectfully presented,



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James W. Miller
Registration No. 27,661
Suite 1005
Foshay Tower
821 Marquette Avenue
Minneapolis, MN 55402

Telephone (612) 338-5915